

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

IN RE: ETHICON, INC., PELVIC  
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CASE(S)  
LISTED ON THE EXHIBIT ATTACHED HERETO:

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**JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITHOUT PREJUDICE**

Plaintiff(s) in the case(s) listed on the attached Exhibit A and Defendants Sofradim Production SAS,<sup>1</sup> Tissue Science Laboratories Limited,<sup>2</sup> and Covidien LP<sup>3</sup> (collectively the “Covidien entities”) and C. R. Bard, Inc., to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

Accordingly, Plaintiffs, the Covidien entities and Bard jointly move the court to dismiss the Covidien entities and Bard (where named) without prejudice in the cases listed on the attached Exhibit A.

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<sup>1</sup> Sofradim Production SAS includes any incorrect or incomplete spellings of this Defendant, including Sofradim Corporation, Sofradim Corp., Sofradim Production, and Sofradim Production, SAS.

<sup>2</sup> Tissue Science Laboratories Limited includes any incorrect or incomplete spellings of this Defendant, including Tissue Sciences Laboratories, Tissue Science Laboratories Ltd., Tissue Science Laboratories, Inc., Tissue Science Laboratories, Limited and Tissue Science Laboratories, Ltd.

<sup>3</sup> Covidien LP includes any incorrect or incomplete spellings of this Defendant, as well as any improperly named affiliates of this defendant, including Covidien Holding, Inc., Covidien Inc., Covidien Incorporated, Covidien International Finance, SA, Covidien LLC, Covidien Ltd., Covidien Trevoux, SCS, Covidien plc, Covidien, Inc., Covidien, LLC, and Covidien, PLC, Tyco Healthcare Group LP, TYCO Healthcare, Tyco Healthcare Group, L.P., Tyco International Ltd, United States Surgical Corporation, United States Surgical Corp., Floreane Medical Implants SA, Floreane Medical Implants, SA, Mareane, SA, Mareane SA, Medtronic PLC, International Technology, Inc., Medtronic MiniMed, Inc., Medtronic Puerto Rico Operations Co., Medtronic Sofamor Danek USA, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek, USA, Inc., Medtronic USA, Inc., Medtronic, Inc. and Medtronic, Inc.

The settlements in the cases listed on Exhibit A relate only to the Covidien entities and Bard. Because other Defendant(s) remain in the case listed on Exhibit A, the case should remain open and Plaintiffs will continue to prosecute their claims against any remaining defendants.

Respectfully submitted this 10th day of April 2019.

/s/ Richard B. North, Jr.

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*Counsel for Plaintiffs listed on Exhibit A*

**EXHIBIT A – JOHNSON LAW GROUP**

| <b>CIVIL ACTION NUMBER</b><br>(listed numerically in ascending order) | <b>Case Name</b> |
|---|------------------|
| 2:17-cv-01536   | Swafford, Cindy  |